

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

KIMBERLY ROQUEMORE, Individually
and as the Administratrix of the Estate of
Maalik Roquemoire, Deceased,

Plaintiff,

vs.

CUYAHOGA METROPOLITAN
HOUSING AUTHORITY, et al.,

Defendants.

CASE NO. 1:24-CV-01434

JUDGE DONALD C. NUGENT

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO FILE
REPLY BRIEF IN SUPPORT OF
MOTION FOR PARTIAL JUDGMENT
ON THE PLEADINGS AND BRIEF IN
OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO
SUPPLEMENT FIRST AMENDED
COMPLAINT**

Now come the Defendants, by and through counsel, and respectfully request an extension of the deadlines to file their Reply Brief in Support of their Motion for Partial Judgment on the Pleadings and any Brief in Opposition to Plaintiff's Motion for Leave to Supplement First Amended Complaint. Specifically, Defendants are requesting a seven (7) day extension from February 25, 2025, through March 4, 2025, to file their Reply Brief in Support of their Motion for Partial Judgment on the Pleadings and any Brief in Opposition to Plaintiff's Motion for Leave to Supplement First Amended Complaint.

Defendants filed a Motion for Partial Judgment on the Pleadings on January 13, 2025. (Doc. #32). Per Local Rule 7.1(d), Plaintiff's Brief in Opposition would have been due by February 12, 2025 – thirty (30) days after service of any dispositive motion. Plaintiff, however, sought an extension through February 17, 2025, to respond, which this Court granted. (Doc. #33 and Doc.

#34). Still, Plaintiff filed her Brief in Opposition on February 11, 2025. (Doc. #36). On that date, Plaintiff also filed a Motion for Leave to Supplement First Amended Complaint. (Doc. #35). Per Local Rule 7.1(e) and 7.1(d), Defendants Reply Brief in Support of their Motion for Partial Judgment on the Pleadings (“the moving party may serve and file a reply memorandum in support of any dispositive motion within fourteen (14) days after service of the memorandum in opposition”) and any Brief in Opposition to Plaintiff’s Motion for Leave to Supplement First Amended Complaint (“each party opposing a motion must serve and file a memorandum in opposition within ... fourteen (14) days after service of any non-dispositive motion.”) would be due by within fourteen (14) days – by February 25, 2025.

Given Plaintiff’s approved extension through February 17, 2025, and the undersigned’s previously scheduled deadlines and professional commitments, Defendants seek a short, seven (7) day extension through March 4, 2025, to file their Reply Brief in Support of their Motion for Partial Judgment on the Pleadings and any Brief in Opposition to Plaintiff’s Motion for Leave to Supplement First Amended Complaint. This requested extension is not submitted for purposes of delay but solely to ensure that the undersigned counsel has sufficient time to fully prepare Defendants’ briefing for the Court’s review and consideration.

Respectfully submitted,

/s/ Aretta K. Bernard

Aretta K. Bernard (0039116)

abernard@ralaw.com

Stephanie Olivera Mittica (0095651)

smittica@ralaw.com

Roetzel & Andress, LPA

222 South Main Street

Akron, OH 44308

P: 330.376.2700

F: 330.376.4577

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on February 21, 2025. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

David B. Malik
david@davidmaliklaw.com
31320 Solon Road, Unit #19
Solon, Ohio 44139

/s/ Aretta K. Bernard
One of the Attorneys for Defendants